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Cañon National Bank
MEMBER F.D.I.C.

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March 6, 2006

Mr. John Carter
Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 95105

Dear Mr. Carter,

I am writing to oppose the application of Wal-Mart Stores, Inc., for Federal deposit insurance coverage for an ILC Charter in Utah. As a community banker I believe that allowing Wal-Mart to own a bank charter and potentially open branches in its network of stores would do irreparable harm to our community and banking institutions, and pose a severe risk to the nation's economy.

I am aware that Wal-Mart has stated that it intends to operate a limited ILC charter in Utah. Their assurances that the operation will remain narrow are neither in the usual Wal-Mart business plan nor in their corporate philosophy. Since this is their fourth attempt to get into the banking business and their CEO has stated that he wants to grow the company and provide financial services to its customers it appears to me that possibly, at a later date they will amend their business plan to offer full financial services and branch into all of their stores. This must not be allowed to happen.

The economy of Canon City, Colorado has already suffered with the arrival of Wal-Mart. A number of stores and businesses have failed or are no longer a strong force in the community. Wal-Mart has a long history of destabilizing communities by undercutting prices of local merchants and driving them out of business. Our community has suffered because of this. The local merchants do not have the strong financial backing that Wal-Mart has and therefore cannot compete as well as they do not have the buying power of a huge corporation behind them.

Wal-Mart does not open stores in communities to be civic partners with the local merchants. Their intention is to drive local stores out of business and steal their customers. If Wal-Mart was allowed to open a bank and then branch what would happen to the banking community as we know it. The FDIC would be ill-advised to set this nation on a course that could result in the demise of the community banking industry as we know it today.

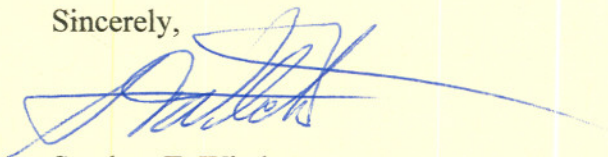
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Colorado Springs Branch • 3204 W. Colorado Ave. • Colorado Springs, CO 80904 • 719/632-4889
Pueblo West Branch • 76 Dunlap Drive • Pueblo West, CO 81007 • 719/647-1111
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Florence Branch • 100 E. Main St. • Florence, CO 81226 • 719/784-5393
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Our Congress has reaffirmed our nation's long standing policy against mixing banking and commerce and with good reason. Mixing banking and commerce would create serious conflicts of interest and distort credit decisions. The impartial allocation of credit is the key of our financial system and must be preserved. Would Wal-Mart offer credit at reasonable terms to its competitors? Would Wal-Mart require its suppliers to bank at the Wal-Mart bank?

If Wal-Mart was allowed to open a bank and then branch into Canon City, Colorado it would cause severe harm to the present banking establishments. All of the banking establishments would find it very difficult to compete as they do not have the capital that Wal-Mart has. Wal-Mart could drive the community banks out of business if they so wanted to. For the sake of the community banks in our nation and the customers of community banks that we serve, please do not allow Wal-Mart to get into the banking business. In order to promote fair competition and consumer choice please deny Wal-Mart's application for deposit insurance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephen T. Witcher", with a long horizontal flourish extending to the right.

Stephen T. Witcher
Vice-President and Cashier